UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE	:	CHAPTER 13

SATINA SHEED, :

BR No. 17-17464-MDC

Debtor. :

ORDER

AND NOW, this day of , 2020, upon consideration of the

Motion of the Chapter 13 Standing Trustee and the Debtor's Response thereto, and after notice and hearing, the Motion of the Standing Trustee is hereby DENIED.

HON. MAGDELINE D.
COLEMAN U.S. Bankruptcy Judge

Interested Counsel and/or Parties:

William C. Miller, Esquire Chapter 13 Standing Trustee P.O. Box 1229 Philadelphia, PA 19105

Jonathan Sgro, Esq. Counsel for Debtor Community Legal Services, Inc. 1410 W. Erie Avenue Philadelphia, PA 19140

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE : CHAPTER 13

SATINA SHEED, :

BR No. 17-17464-MDC

Debtor.

<u>DEBTOR'S RESPONSE TO THE</u> STANDING TRUSTEE'S MOTION TO DISMISS

The Debtor, Satina Sheed, through counsel, responds to the Chapter 13 Standing Trustee's Motion to Dismiss as follows:

- 1. The Motion asserts that Debtor is not making payments.
- 2. As of the date of this Response, Debtor's plan payment arrears is \$1,375.
- 3. As of the date of this Response, Debtor had paid electronically to the Trustee her plan payment for November of \$620, which has not yet been credited to her account.
- 4. Debtor intends to pay an additional \$200 to the Trustee on or around December 1, 2020.
- 5. After these two payments totaling \$820 are credited to her account, Debtor's arrears will be less than one plan payment.

WHEREFORE, the Debtor requests that this Court deny the Standing Trustee's Motion to Dismiss.

Respectfully submitted,

Date: November 19, 2020 s/ Jonathan Sgro

JONATHAN SGRO, ESQ.

Attorney for Debtor Community Legal Services, Inc. 1410 W. Erie Avenue Philadelphia, PA 19140 Tel: (215) 227-4376

Fax: (215) 227-2435 jsgro@clsphila.org

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE	:	CHAPTER 1	.3
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SATINA SHEED, :

BR No. 17-17464-MDC

Debtor. :

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CERTIFICATE OF SERVICE

I, Jonathan Sgro, Esquire, hereby certify that I served a copy of the foregoing Response to the Standing Trustee's Motion to Dismiss by electronic filing and by first class U.S. mail postage prepaid on the date below, upon the following parties:

William C. Miller, Esquire Chapter 13 Standing Trustee P.O. Box 1229 Philadelphia, PA 19105

Respectfully submitted,

Date: November 19, 2020 s/ Jonathan Sgro

JONATHAN SGRO, ESQ.

Attorney for Debtor

Community Legal Services, Inc.

1410 W. Erie Avenue Philadelphia, PA 19140 Tel: (215) 227-4376

Fax: (215) 227-2435 jsgro@clsphila.org